

EXHIBIT 1

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

DOUGLAS MASTRIANO,

Plaintiff,

Case No. CIV-24-567-F

JAMES GREGORY, III
1509 Vandivort Place
Edmond, OK 73034

Hon.

And

Roland Kuhn, the National Research Council of
Canada, Paul Mazerolle, President and Vice-
Chancellor, University of New Brunswick, Canada;
David MaGee, Vice-President, Research; Drew
Rendall, Dean, Graduate Studies; Jeff Brown; Cindy
Brown, Stephen Dutcher; Sean Kennedy; Erin
Morton; Matthew Sears; lee Windsor; Stefanie Hunt-
Kennedy; Carolyn MacDonald; Sasha Mullaly; Lisa
Todd, Sarah-Jane Corke; Bonnie Huskins; Elizabeth
Mancke; Janet Mullin; Angela Toze3r; Margaret
MacMillan; Robert Bothwell; John Ferris; - *each in
his or her individual capacity,*

And

University of New Brunswick, Canada,

And

National Research Council of Canada,

And

John & Jane Doe,

Defendants.

DECLARATION OF ROLAND KUHN

Roland Kuhn, hereby declares as follows:

1. I am a Canadian citizen.
2. I reside in Ottawa, which is in the province of Ontario, Canada.
3. I am a Principal Research Officer at the National Research Council (the “NRC”). I work from the NRC office in Ottawa, Ontario.
4. I have never conducted business in the state of Oklahoma and I have never been physically present in the state. I have no interstate business that involves Oklahoma.
5. I drafted an Abstract (the “Abstract”) in 2023 for the purpose of submitting it to a committee of faculty at the University of Manitoba, in Canada, who were organizing a symposium on the subject of Academic Integrity. The Abstract was a stand-alone document with no article or other substantive writing attached. I submitted the Abstract to the university committee with a request to a present a case study at the University of Manitoba’s 2023 Canadian Symposium on Academic Integrity.
6. Nothing in the substance of my Abstract was directed to the State of Oklahoma or any resident of the state.
7. The faculty committee granted my request. The symposium was held on June 1, 2023 and on June 2, 2023, at the Winnipeg campus of the University of Manitoba (the “Winnipeg Symposium”). I spoke at the Winnipeg Symposium on June 1, 2023. My case study presentation addressed the manner in which the University of New Brunswick addressed the issues related to requests for Plaintiff’s dissertation.

8. A copy of the slide deck I used during my presentation is attached as Exhibit 1.

9. My remarks at the Winnipeg Symposium were directed to the in-person attendees of the symposium. Nothing in the substance of my prepared remarks or in the substance of my answers to any question at the Winnipeg Symposium was directed to the State of Oklahoma or any resident of the state.

10. The Winnipeg Symposium was attended by approximately 130 attendees. It was not broadcast or recorded for broader public distribution. Thus, the only audience that heard me speak were the attendees of the Winnipeg Symposium in Canada.

11. The Abstract that I had submitted to speak at the symposium was made publicly available by the University of Calgary in July 2023 through its journal, *Canadian Perspectives on Academic Integrity*. I played no active role in the public dissemination of my Abstract.

12. A copy of my Abstract as published in *Canadian Perspectives on Academic Integrity* is attached as Exhibit 2.

13. I am not aware of a “Canadian Symposium for Academic Integrity” that was held at the University of Toronto as alleged in the Complaint in this case. If any such an event were held, I did not present at it, did not attend it, and was not associated with it in any manner.

14. I submitted my Abstract to the University of Manitoba committee on my own behalf, and not as a representative of the NRC. My presentation at the Winnipeg Symposium was made on my own behalf, and not as a representative of the NRC.

15. On July 2, 2024, while on vacation, I received an email from Daniel L. Cox, asking that I waive service of the Plaintiff's Complaint. I did not agree to waive service.

16. On August 27, 2024, I received a package with my name on it through interoffice mail at my NRC office in Ottawa. The package arrived with two other packages addressed to other individuals, which I returned unopened to my supervisor.

17. The package bearing my name was sent by mail to the NRC.

18. I had not authorized the NRC or any of its personnel to accept service of process on my behalf.

19. The contents of the package addressed to me included a Civil Cover Sheet, a Summons issued to "National Research Council," and a copy of the Plaintiff's Complaint.

20. A copy of what I received in the package (other than the Complaint) is attached as Exhibit 3.

21. The package did not include a Summons issued in my name.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 15th day of October, 2024.

A handwritten signature in blue ink that reads "Roland Kuhn". The signature is written in a cursive, flowing style.

ROLAND KUHN

EXHIBIT 1

The Mastriano PhD Scandal at the University of New Brunswick (UNB)

Roland Kuhn, PhD

Principal Research Officer

National Research Council of Canada (NRC)

June 1, 2023

Winnipeg, Manitoba



DISCLAIMER: this presentation does not in any way represent the views of my employer! (I'm on my own time & paying my own way here)

Background

In 2022, Colonel Douglas Mastriano, retired US military officer, runs for Governor of Pennsylvania. He often mentions his PhD from University of New Brunswick (UNB). **But there are strange circumstances surrounding that PhD which attract media attention.** Let's go back in time:

- 2013: Mastriano is awarded a History PhD by UNB. His thesis is on Sgt. Alvin York, a US WW I hero. The thesis research involved archaeology in France which Mastriano claims has uncovered the site where Sgt. York singlehandedly (almost) captured 132 German prisoners in 1918.
- 2009-2012: prior to completion of the thesis, 3 historians cast doubt on M's archaeological work.
- 2013: Stephan van Meulebroeck (Utrecht U.) writes to UNB about these issues, receiving no reply.
- 2014: Mastriano publishes a book based on his thesis, "**Alvin York: A New Biography of the Hero of the Argonne**".

March 2021: James P. Gregory, a graduate student at the University of Oklahoma who is studying the career of Sgt. York & who was initially enthusiastic about the "new evidence" in Mastriano's 2014 book, writes to UNB citing 35 cases of what he considers to be academic fraud in it (mostly misrepresentation of archival sources). He receives a dismissive reply – and **UNB refuses him access to Mastriano's 2013 thesis, saying it's embargoed until 2030. (They had earlier refused access to other historians, too).** Later, it emerges that the thesis was approved despite objections from a thesis committee member.

DISCLAIMER: this presentation represents the views of Roland Kuhn, not those of his employer.

Clarification

- This talk is not focused on WW I history. **I'm not a historian!** The focus is on UNB's response to credible allegations of academic fraud surrounding the granting of a PhD thesis, in the face of attention from the media.
- My personal, cynical/realistic view: people on PhD thesis committees are human — from time to time, a bad thesis will slip through & someone who doesn't deserve it will be awarded a doctorate. This can happen at the most reputable universities. **This case is interesting because of peculiar behaviour by UNB before, during, & after giving Mastriano a doctorate — not just because a thesis facing credible allegations of misconduct was approved.**
- Douglas Mastriano has political views — he's a Trump supporter and Christian nationalist who propagates the "Big Lie" about the 2020 US election & who passed through breached police barriers during the Jan. 6, 2021 Capitol attack (Video seems to show Doug Mastriano closer to Capitol riot than he said — WHY?) — which I personally find abhorrent. **This is completely irrelevant to today's discussion.** His thesis must stand or fall on its own merits. (Some of the most brilliant papers in my own field, computational linguistics, were written by a man — Robert Mercer — who subsequently became a major funder of US far-right organizations such as Breitbart News; his vile politics in no way invalidate the excellence of his academic work).

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All the same, you need to know a bit about the historical context

Many Americans believe that on October 8, 1918, one member of a 17-member US Army patrol – Sgt. Alvin York – captured 132 German prisoners in the Argonne, NE France, almost single-handed (with a bit of assistance from his colleagues). An exaggerated version of this story was shown in a 1941 Warner Brothers film. It would be unfair to Douglas Mastriano to claim that his thesis & book are anywhere near as inaccurate as the movie – however, the central theme, of Sgt. York's dominant role in the prisoner capture, is retained.

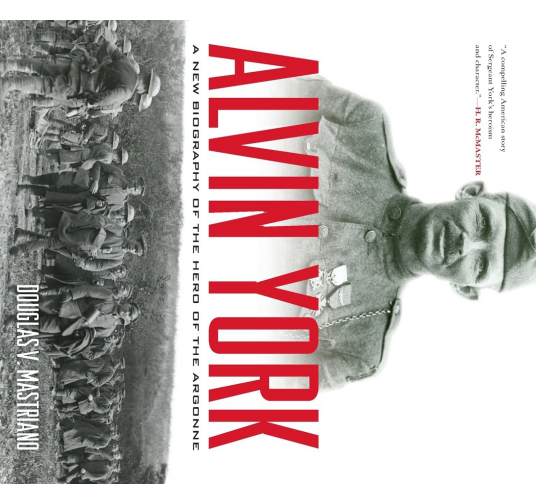
True fact: York was a strong Christian who was a conscientious objector at the start of the war. "Pacifist becomes warrior for Christ and America" is an appealing story line ...



**SGT. ALVIN YORK PORTRAYED AS
SOLE HERO OF THE BATTLE**



NOTE: Warner Brothers had foolishly
given Sgt York a veto on the script
(according to James P. Gregory).



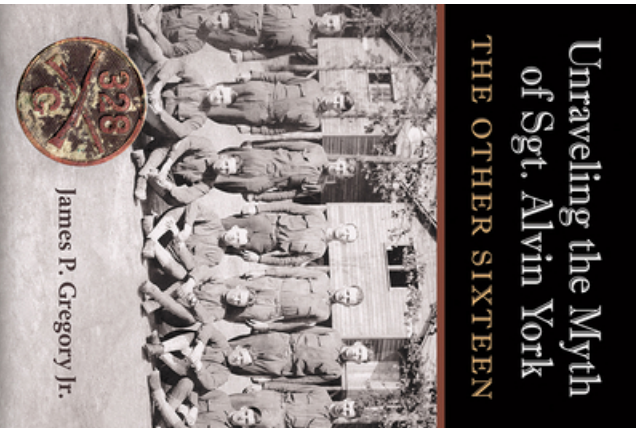
1941 movie

**D. Mastriano's 2014 book
(& his 2013 PhD thesis)**

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All the same, you need to know a bit about the historical context (continued)

James Gregory's nuanced version: Sgt. Alvin York did indeed act heroically on Oct. 8, 1918. However, so did several of the "other sixteen": the capture of the 132 prisoners was a joint effort. Starting with an inaccurate, propagandistic article in the *Saturday Evening Post* (April 1919), unscrupulous journalists and military officers created the myth of York as a single-handed Christian warrior. Mr. Gregory devoted considerable effort to tracking down accounts by the "other sixteen" and related documents (e.g., in the German archives) for his book.



J. Gregory's 2022 book

JAMES GREGORY: SGT. ALVIN YORK WAS ONE OF SEVERAL HEROES OF THE BATTLE

Note: Mastriano also claims to have discovered the site of the battle in France. A reputable team of US archaeologists led by Dr. Thomas Nolan says he's wrong: they uncovered strong evidence supporting a site 0.6 km away.

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Dueling quotations

From D. Mastriano's 2013 thesis

Pg. 260: "The idea that York survived the carnage because of Divine Intervention also speaks of a miracle."

Pg. 471: "Throughout his life, and even to this day, there have been a string of detractors, who question whether the York saga is genuine."

Pp. 479-480: "Alvin C. York proved to be a hero throughout his life ... Throughout it all he never compromised his faith. The decision he made in 1915 to become a Christian was the single most important point in his life ... For some, his personal testimony is too much to bear, and they seek a way to cast aspersions upon him ... Meanwhile, for others, Alvin York serves as an example of what one can accomplish when they choose this day to serve the Lord."

From J. Gregory's 2022 book

Pg. 116: "Mastriano's approach harks back to that of George Patullo [author of the 1919 *Saturday Evening Post* article] focusing on York's religious conviction ... Mastriano upholds earlier versions of the story and increases the mythical aspects even though he had access to a wealth of new primary research ... Mastriano chose to attack the accounts of the other men."

Pp. 128-129: "The battle that took place on October 8, 1918, would color the rest of the survivors' lives. But one man, Alvin York, found himself thrown into the center of the story. Despite his wishes and the wishes of the other survivors, outside groups altered and exaggerated the story into a legend until Warner Bros. created a new myth with Sergeant York. An experience shared by seventeen became a 'single-handed' encounter, with Alvin York as the sole hero."

Michael Kelly, historian & author of "Hero on the Western Front" (2018)

Interview with Associated Press ([Amid campaign, Mastriano's disputed dissertation made public | AP News](#); Sept. 9, 2022): "I believe the truth is nonexistent in Mastriano's vocabulary, but the word 'detractors' is and he applies it to anyone who is in disagreement with him."

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Timeline of the scandal

- Under normal circumstances, nobody in 2022 except military historians would care about a thesis written in 2013 about a WW I soldier. Mastriano's high-profile run for Governor of Pennsylvania as a far-right Trump supporter changed that ...
- UNB had claimed that Mastriano's thesis could not be released until 2030. They refused four requests to view the thesis between 2020 and the first half of 2022. In May 2022, a UNB spokesperson (Heather Campbell) wrote in response to a CBC request: "The choice to embargo a thesis is at the discretion of the author, not the institution ... She said an author's reasons for not wanting work shared 'are not scrutinized,' and an embargo could last indefinitely under university rules. 'It is by default for four years, but an author may request an extension' ". **UNB refused to release even the title of the dissertation**. (Source: UNB releases controversial U.S. politician's PhD dissertation after months of refusals | CBC News; Sept. 16, 2022).
- Under pressure from the media on both sides of the border, UNB suddenly made Mastriano's thesis available in August 2022 (*ibid*).
- "The university did not address false statements its representatives made over the past two years claiming the extended embargo was normal and up to Mastriano alone to end" (*ibid*).

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Timeline of the scandal (continued)

- Oct. 5, 2022: “A UNB associate professor listed on Doug Mastriano’s doctoral dissertation describes it as atrocious academic work and says he can’t understand why the paper includes his name. **‘This dissertation has bothered me for nine years,’** Jeffrey Brown told CBC News in an interview. **‘[Mastriano] was awarded a PhD on very shaky grounds.’** ... Brown told Milner [chair of the thesis committee] that, from what he understood, regardless of his complaints, Mastriano would get his degree anyway. Brown wrote: ‘I know that I will regret it if I allow my signature to stand on this dissertation.’ He says Milner responded that his services were no longer needed because the three-member examining committee already had enough people ... But he just got a surprise. The university finally released Mastriano’s thesis over the summer, amid external pressure after a years-long delay in making it public. **Brown’s name is still there, listed on the examining board.”** (Source: [A controversy-courting U.S. politician causes stir on Canadian university campus | CBC News](#)).
- Oct. 6, 2022: having finally got access to Mastriano’s 2013 thesis, **James P. Gregory updates the criticisms of Mastriano’s work** - based only on M’s 2014 book — listing **35** serious errors, that he had sent UNB in January 2021, and to which, in his opinion, he received an inadequate, even insulting, response. His new analysis is based on the thesis, **and turns up 213 serious problems** (most of which he terms “academic fraud”).
- Nov. 8, 2022: Douglas Mastriano loses election to be Governor of Pennsylvania (in a landslide).

NOTE: I have electronic copies both of Mastriano’s thesis & of James P. Gregory’s critique of it — I’d be happy to send these to anyone who gives me their email address.

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Summary of breaches of academic ethics arguably committed by UNB

- Removing a committee member who objects to a draft thesis without trying to get the candidate to accommodate the objections is dodgy; **leaving this ex-committee member's name on the granted thesis is definitely unethical.**

- The originally imposed 17-year-old embargo (from 2013 to 2030) on access to Mastriano's thesis was outrageous. **Academic research is meant to fuel open discussion & debate. The embargo was also misuse of public funds:** taxpayers in New Brunswick & Canada paid for the thesis (via faculty salaries, SSHRC research grants, etc). **There can be no justification for the embargo – it was unethical.**

- **Lying to the public** by inventing an embargo policy that did not exist was **unethical**.

NOTE: UNB's actual embargo policy throughout 2013 to 2023 could not be clearer:

"A student may request an embargo of their thesis, limiting its accessibility to the public for any period to a maximum of 4-years. All such requests must be accompanied by a detailed justification and will be reviewed and considered for approval by the Dean of the School of Graduate Studies. Requests for extension will not generally be considered." **NOTE: no justification for hiding the title of a thesis 😊**

(https://www.unb.ca/gradstudies/current/resources/regulations-and-guidelines/thesis_defence_procedures.html)

My speculations about UNB's real reason for trying to conceal the thesis for 17 years are too uncharitable to record here ...

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Summary of breaches of academic ethics arguably committed by UNB (cont'd)

Ignoring Stephan van Meulebrouck's & Jeffrey Brown's criticisms of M's research in order to push the 2013 thesis through was unethical. So was the dismissive response to James P. Gregory's detailed letter of January 25, 2021 listing issues with Mastriano's 2014 book.

Mr. Gregory writes in his "Second Report of Academic Fraud" (Oct. 2022):

"The initial response I received from UNB was one of disdain. Those in the **Gregg Centre** [see next slide] would not return calls or emails in request of his dissertation. **Dr. David MaGee's** investigation reported: 'I have reviewed the results of the inquiry and have determined that this allegation does not require a formal investigation ...'" Dr. MaGee stated that any problems with M's published research were due to "honest error" (e.g., faulty transcription & incorrect pagination).

James P. Gregory writes that of the 35 problems he'd pointed out in the book, only 15 could conceivably be due to honest error (recall that more recently, he found 213 problems in the thesis, most of them clearly not "honest errors").

NOTE: remember "Gregg Centre" & "David MaGee".

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Why did UNB behave this way?

NOTE: I'll report hypotheses from members of the UNB community – I have no inside knowledge.

From [The Gregg Centre | UNB](#): "The **Gregg Centre** for the Study of War and Society ... is an interdisciplinary

research centre based in the Faculty of Arts and connected across the University of New Brunswick. The **Gregg**

Centre mission is to study war as a complex social phenomenon to understand its cause, course, and consequence

for Canada and the world." It often receives military funding (e.g., see [UNB's Gregg Centre receives funding from](#)

[Veterans Affairs Canada for research and education project](#); July 20, 2021). Mastriano's thesis was supervised by

UNB professors at the **Gregg Centre**.

- From [A controversy-courting U.S. politician causes stir on Canadian university campus | CBC News](#): (Oct. 5, 2022): "The professor, Brown, has a theory about what happened. The school, he says, **has a good relationship with the military, and let Mastriano through to avoid disrupting that.**"

- A graduate student, Richard Yeomans, has been even more outspoken: "A lot of us vented our frustrations at this... This reflects on our academic training," said Richard Yeomans, a PhD candidate in the history department. "This man's credentials are unearned... It's very clear **a vanity degree was granted to him**" (*ibid*).

Richard Yeomans raised serious questions about the **Gregg Centre's impact on UNB's academic integrity on his Twitter account** – see next four slides.

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Richard Yeomans @richrray · Oct 5, 2022

Replying to [@richrray](#)

In 2013, a committee assembled by the former director of the Gregg Centre for the study of war and society organized a defence for a PhD candidate that had, at that point, only been in the programme for 3 years. (2)



2



2



26



Richard Yeomans @richrray · Oct 5, 2022

That committee only had one person who could be called an ‘expert’ on the subject of the dissertation and was the external reader. That external was, according to the Candidate, a long-time friend and mentor of the project. He was not an impartial or “arms length” reader (3)



2



2



30



Richard Yeomans @richrray · Oct 5, 2022

Nine years later, a PhD candidate from the US got a copy of the dissertation and has, thus far, found over 150 instances of what he labels ‘academic fraud,’ and since March 2021 has been trying to get a response from UNB History or the Gregg Centre (4)



Richard Yeomans @richrray · Oct 5, 2022

He has been ignored for well over a year. Now that this issue has become a major media story, the Department and Gregg Centre continue to say nothing, and have not even acknowledged why current grad students might be upset (5



1



2



35



Richard Yeomans @richrray · Oct 5, 2022

Because we are upset. Imagine committing 5+ years of your life and thousands of dollars so you can produce good research, and then come to find someone else was granted the same degree after 3 years, (6



Richard Yeomans @richrray · Oct 5, 2022

And defended what was essentially a flawed biography to a committee that was not in the least bit critical. Now that person's PhD has been used to absolve them of being blatantly racist. He openly romanticizes antebellum America, the confederacy, and what it stood for (7

🗨 1

↻ 3

♡ 47



...



Richard Yeomans @richrray · Oct 5, 2022

There are a lot of faculty in my department that will call themselves allies, including those in the Gregg Centre. But from this, and other examples because I do not think 2013 was not an isolated incident, it is clear that they will not treat students equitably (8

🗨 1

↻ 3

♡ 30



...



Richard Yeomans @richrray · Oct 5, 2022

Instead, the department of history at UNB will grant vanity PhDs to some students; but demand labour-intensive research from others. It's not fair to any of us, and it's especially unfair to students working with the Gregg Centre who are actually putting in the work. (9

...



Richard Yeomans @richrray · Oct 5, 2022

...

I know that there are many PhDs out there that were less than deserved. But that fact does not make this situation better for us. It does not excuse the way that committee was formed, who was on it, and the continued lack of communication from the department to its students. (10



1



2



35



Richard Yeomans @richrray · Oct 5, 2022

...

The department is a mess. The academy is a mess. I shouldn't have to be the one to speak up in defence of my education at UNB, no student should have to do this. But they made us do this because they've known since March 2021 about this. (11



1



3



56



Richard Yeomans @richrray · Oct 5, 2022

...

As I see it, it was easier to just ignore the student this hurt in 2021, and those who have been hurt in 2022, than to acknowledge a gross example of academic negligence. And for what? To preserve the relationship between UNB history and the military? No thank you.

Allegation from Yeomans is very serious – and unproven!

IMPORTANT: in the tweets repeated in 4 previous slides, Richard Yeomans is alleging **continuing** ethical breaches at UNB. Specifically, that there is a double standard for PhD theses, with some (but not all) theses associated with the Gregg Centre & the military being held to a much lower standard than other theses. In his view, Douglas Mastriano's thesis is merely one example of this pattern.

REMEMBER – THIS IS ONLY AN ALLEGATION! It may well be false ... though in my opinion, it should be investigated.

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How is UNB dealing with the allegations?

In early November 2022, President Paul Mazzerolle promised to organize a review of the Mastriano thesis after the US elections ([UNB kept quiet about Mastriano controversy because of U.S. elections, president says | CBC News](#)). I was sceptical – I thought he was kicking the can down the road, hoping the media would lose interest once the Pennsylvania election was over – but I was wrong. There are two investigations going on:

- “An independent review of UNB’s **policies and procedures** related to graduate studies (admissions, thesis supervision, examining committee selection and roles, thesis embargo, etc.)” This one began in Jan. 2023; it’s not linked to Mastriano’s thesis in particular.
- An investigation by three historians, not employed by UNB, into **allegations of academic fraud in Mastriano’s thesis**. This one is being conducted in the utmost secrecy – not even the names of the three historians have been released. It is organized by **David MaGee**.

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Questions

- Will the “policies & procedures” investigation look at the Richard Yeomans allegation of “vanity” PhD theses for some but not all **Gregg Centre** students?
- Is **David MaGee**, who was dismissive of James P. Gregory’s well-documented examples of issues with Mastriano’s 2014 book & who refused him access to M’s 2013 thesis, the right person to organize the external investigation into that thesis – which according to Mr. Gregory, has some of the same problems as the book (& additional ones)?
- A letter from **Dr. MaGee** seems to imply that the findings of the external investigation into the thesis will never be made public (this is based on UNB’s confidentiality policy). Public money funded the thesis, presumably public money is funding the investigation ... does the public not have a right to know the findings?



PAUL MAZEROLLE, President of UNB



DAVID MAGEE, Vice-President
(Research)

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Discussion (for the audience)

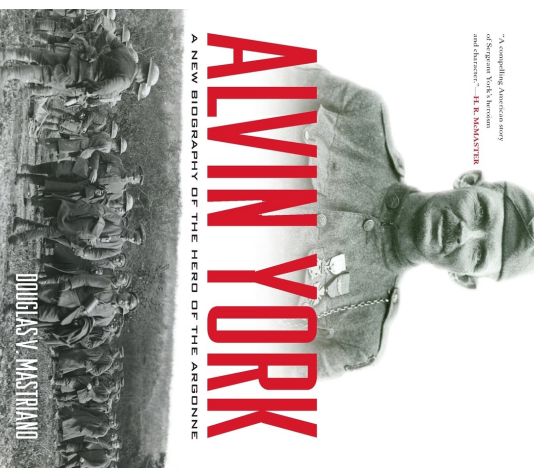
- Did UNB behave ethically in this matter?
- If UNB did breach academic ethics in this case, which was the worst breach?
- It could be argued that the “policies & procedures” investigation at UNB is a case of an **organization that is possibly guilty of academic misconduct investigating itself**. E.g., suppose the allegations of Richard Yeomans are **true** (they might not be) – how likely is it that any committee set up by the UNB administration will issue a statement saying, “**Gee, for years we’ve been giving out doctorates to some people, especially military people, who don’t deserve them – we’re sorry!**”? Is there a better way?

- What about UNB’s policy of keeping the findings of the investigation into Mastriano’s thesis entirely confidential – is it reasonable? If nobody outside UNB can read this report, how will any outsider know that the criticisms of Mr. Gregory & other historians have been taken seriously? If Mastriano is exonerated of academic fraud, is it fair to him not to make that widely known?
- NOTE:** personal confidentiality is a genuine issue in academic misconduct investigations – UNB isn’t wrong to impose some degree of confidentiality. University of British Columbia (UBC) has a good policy that’s a compromise between transparency & confidentiality ...

James P. Gregory's Research into the Sgt York Myth

If you're interested in WW I history, I highly recommend James P. Gregory's recent book (below) and a fascinating video in which he summarizes his findings:

<https://www.youtube.com/watch?v=tvTBsv5Wt0I>



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Research into academic misconduct by Canadian faculty & university administrations

If you're interested in misconduct "beyond students" at Canadian universities, read:

Christensen Hughes, J., Eaton, S. (2022). "**Academic Misconduct in Higher Education: Beyond Student Cheating**". In: Eaton, S.E., Christensen Hughes, J. (eds) Academic Integrity in Canada. Ethics and Integrity in Educational Contexts, vol 1. Springer, Cham.

Or, talk to the two authors at this conference! Maybe their Friday 10:15 am talk, "Academic integrity in Canada: An enduring and essential challenge" will cover this topic ...

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EXHIBIT 2

The Mastriano Scandal at UNB

Roland Kuhn, National Research Council of Canada

Session type: Original research

Abstract

This case study looks at how a fraudulent PhD thesis from a Canadian university became entangled in US politics, attracting US and Canadian media attention. In 2013, Douglas Mastriano, a US Army colonel, was granted a History PhD from the University of New Brunswick (UNB) under unusual circumstances. A thesis committee member was removed without his consent, then informed by UNB that the thesis had been approved over his strong objections. UNB declared a 17-year-long embargo on public access to Mastriano's thesis (it later admitted that its rules limit thesis embargoes to 4 years).

In 2014, Mastriano published a book based on his thesis. Respected historians found multiple instances of academic fraud in it, including falsification of archival information. Scholars who requested access to Mastriano's thesis were rebuffed by UNB. There, matters might have rested. However, in November 2022 Douglas Mastriano ran for Governor of Pennsylvania. A Donald Trump supporter and participant in the Jan. 6, 2021 US Capitol invasion, he often cited his PhD from UNB during his campaign. Under media pressure, UNB released his thesis in October 2022. So far, 213 cases of serious academic fraud have been found in it. Before November 2022, UNB promised that "two independent investigators" would investigate Mastriano's 2013 thesis and the 17-year-embargo on access to it. Subsequently, UNB has walked back that promise.

Attendees will learn about the practical and ethical issues faced by a Canadian university when an old case of academic fraud unexpectedly becomes a source of controversy in the media.

EXHIBIT 3

National Research Council of Canada
46 Dineen Drive
Fredericton, NB E3B 9W4
Att: Roland Kuhn

1200 Montreal Road
Building M58
Ottawa, Ontario K1A 0R6

UNITED STATES DISTRICT COURT

for the
Western District of Oklahoma

Douglas Mastriano

Plaintiff(s),

v.

James Gregory, III, et al

Defendant(s).

Case No. 5:24-cv-00567-F

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

National Research Council of Canada
1200 Montreal Road, Building M-58
Ottawa, Ontario K1A 0R6

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) - or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) - you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Douglas Mastriano
c/o Daniel L. Cox
The Cox Law Center, LLC
P.O. Box 545
Emmitsburg, MD 21727 410-254-7000; e-mail: dcox@coxlawcenter.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Signed and sealed by the Clerk of the Court or Deputy Clerk.